

1. I, ANDREW MANNING hereby declare under penalty of perjury that the following
2. statement is true and correct to the best of my knowledge and belief:
3. I am over 18 years of age, of sound mind and competent to testify to the matters
4. declared herein.
5. I've been assigned and housed in Disciplinary Segregation Unit (DSU) at Oregon
6. State Correctional Institution (OSCI) since July 10th 2021 for a non-violent 120 Day Sanction.
7. I'm due to be released from DSU December 16th, 2021.
8. I've been incarcerated twice, from 2008-2017 and 2018 until 2020. I have been housed
9. in Snake River Correctional Institution (SRCI) DSU, Eastern Oregon Correctional Institution
10. (EOCI) DSU, and Two Rivers Correctional Institution (TRCI) DSU. All for 120-180 days. All but
11. one (1) Sanction for non-violent conduct.
12. The DSU at OSCI is by far the worst, degrading and unclean Environment I have ever
13. been in. The cells are only 8'x8' with very little floor space. The toilet is six (6) inches from
14. the bed. We are considered lucky to even get the chance to clean our cells three (3)
15. days a week.
16. Since I have been housed in this inhumane and degrading Environment, I've
17. Experienced Extreme and unwarranted cruelty with no ability to Engage in productive
18. activities, inadequate recreation opportunities, no social interaction, no natural light, no
19. Clean air. It truly feels like being locked in a dungeon and forgotten.
20. I wouldn't wish this experience on anyone. Despair and hopelessness has settled in my
21. chest. Going through and experiencing depression, anxiety and anger in this 8'x8' cell is
22. maddening.
23. Since being housed in DSU here at OSCI, I have Endured another two (2) deaths
24. of close family members. That's a total number of five (5) deaths since October 2019, with

25. my mother being the first loss. I kuted (prison form of communication) Behavioral Health
 26. Service (BHS) on these matters and about grieving and BHS responded by saying, "Try kutting
 27. the library for a book on grieving. Sorry for your loss." The library here at OSCJ doesn't
 28. allow Adults in Custody (AICs) to check out books or legal materials while housed in DSU.
 29. I've also kuted medical while housed in DSU about my issues on eyesight, hearing,
 30. headaches, weight loss and back pain along with major pain with a tooth and all I get back
 31. in response from medical is, "You're on the list to see a provider." Their only response for
 32. AICs in DSU is either, "You're on the list to see the provider" or "kute us when you're back
 33. in general population (GP)."
 34. I had surgery done on my left chest and left shoulder June 1st, 2021. A month later, I was
 35. placed and housed in DSU here at OSCJ. On my trips to medical for physical therapy, I got
 36. to witness and over hear Oregon Department of Correction (ODOC) staff members not only talk
 37. bad about AICs but other staff members. Staff degrade and disrespect each other calling them,
 38. "Mr. Oregon Way," or saying, "These AICs are in DSU, they don't deserve phone calls, visits," and
 39. similar comments.
 40. It's actions like that by ODOC staff that allow thoughts of distrust and resentment to reside
 41. and take hold in my head. I mean, if staff here at OSCJ have no respect for other staff
 42. members, they definitely won't have it for me.
 43. There's no compassion, empathy, consideration, understanding or respect. We are just
 44. as much as human's as they are. I have never experienced social pain like this. I can't help
 45. but feel and embrace the hate and disgrace this experience has instilled inside me.
 46. When I attempt to take matters into my own hands and learn about anxiety, depression
 47. and grief. Not only was I shut down, I was road blocked. I ordered thirteen (13) books
 48. and when they all came in at once, I wasn't able to receive them because policy says

49. I'm only authorized to have three (3) books at one time while in DSU. The books were
 50. placed in my personal property which I have no access to until December 1st when
 51. I am released back into general population.

52. When I approached staff on numerous issues while in DSU, staff's response was
 53. one of the following, "Do or don't, it's all the same to me," "write a grievance," or "I'm getting
 54. fired in a few weeks, what do I care?" Some staff refuse to get the shot for the covid
 55. vaccination. So I have heard that last response by staff here a lot. With no respect or
 56. professional courtesy or consideration from staff and the mandate fast approaching. I am
 57. left suffering in a system that is broken.

58. In truth, my time in solitary confinement here at OSCJ has put me in a physiological
 59. and psychological warfare with myself. And then mixed with the prolonged social
 60. isolation and no available programs doesn't even begin to help or inspire change, let alone
 61. rehabilitate me.

62. Almost every other DSU in the State of Oregon offers programs and classes and incentives
 63. based on behavioral changes. They allow ALCs to use the phones and tablets (weekly) to
 64. communicate with family and loved ones, which is extremely important during this pandemic.
 65. They offer social interactions weekly and daily with staff such as chaplains, BHS and DSU
 66. counselor. They offer the chance to be pro-active, program, productive and social, even daily
 67. cell sanitation. They offer the tools to change, to grow, to learn awareness. OSCJ offers none
 68. of this.

69. Here in solitary confinement at OSCJ, I feel I only co-exist here because staff here
 70. allow me to. It's rare and uncommon to have staff look at you for you, look and talk to you as a
 71. human being.

72. The very worst experience in my life was when my mother passed away while I've been

73. incarcerated. The Experience I've Encountered while housed here in DSU at OSC1 and the
 74. treatment I've been given or lack there of is a close second to the worst Experience in my life
 75. and it is certainly not doing anything to help me heal and grow.

76. I have been obligated to write grievances on staff to hold them accountable. On the policy
 77. and procedures here at OSC1 to "force" staff into attending and producing better living conditions,
 78. Consideration, compassion and decency towards me and other AICs. I mean, common sense
 79. and common courtesy to have the showers cleaned after daily use during a covid-19 pandemic
 80. while DSU houses AICs on quarantine who uses the same showers. why do I have to write a
 81. grievance on staff asking for clean showers.

82. Or write a grievance when staff force us to eat contaminated food or not eat at all.
 83. General population orderlies were cleaning a flood on AIC caused by purposely plugging his
 84. toilet while the dinner meal was being handed out. The staff had to wade through the toilet
 85. water just to pass us our food. When we brought it to staff's attention we were told, "Eat or don't,
 86. it's all the same to me." But, the other section in DSU that was also affected by the flood
 87. from the AICs toilet received sack lunches instead of contaminated food. I couldn't even get
 88. cleaning supplies to clean my cell from the toilet water that made it's way into my cell. I
 89. was assigned to the cell right next to the AIC who flooded the tier with his dirty toilet
 90. water.

91. It's possible that a simple display of compassion, courtesy and understanding.
 92. Even a little social interaction could easily be enough to stop us from rolling down hill to a
 93. deeper demise.

94. There was an incident on the tier I'm housed on that consisted of an AIC calling other
 95. AICs hateful and racial slurs. This action lasted for almost a week. All staff would do is
 96. turn on a deafening Exhaust fan and shut the door to our tier to drown out the noise

17. So they didn't have to hear it. Which only caused the AIC to yell louder and be more aggressive
 18. and disruptive. Instead of staff resolving the problem immediately, they just laughed off
 19. the situation and let it go on for days. Subjecting all of us to unbearable living conditions.
 20. The Environmental and social isolation, the extreme and unwarranted cruelty, the
 21. feelings of hurt and distress, social deprivation, loss, rejection and exclusion has damaged
 22. me mentally and physically.

23. I am sanctioned for 120 days plus for a non-violent rule violation and had to watch
 24. multiple AICs come back to DSU multiple times for assaulting another AIC and only receive
 25. 30-day sanctions. Some only got 20 days and released after 17 days from DSU. What
 26. messages does that seem to deliver? What behavior and actions is CDC really condoning?

27. The long-term sanctions in DSU is profoundly detrimental and serves no purpose in
 28. rehabilitation and social integration or behavioral change. Let alone stand with the
 29. philosophy of the Oregon Way: to treat AICs "in the most humane way possible."

30. On the first page in the Oregon Department of Corrections Handbook for Rules of
 31. Prohibited conduct. Underneath, "Prohibited Conduct Guidelines," it reads: "It is the policy
 32. of the Department of Corrections to hold Adults in Custody (AIC) accountable for misconduct
 33. while incarcerated, and to promote and reinforce pro-social behavior by AICs, through a
 34. system of disciplinary rules and procedures that embrace the Oregon Accountability Model.
 35. We are here to change behavior and not punish. Employees are expected to use the lowest
 36. level consequences appropriate to the situation to achieve the desired change or compliance."

37. My long term sanction here in solitary confinement at OSCI doesn't promote or reinforce
 38. pro-social behavior. It has simply been a misuse of power and accountability. It is a place
 39. no source of light seems to reach, and I am made worse not better by this practice.

40. Pursuant to 28 USC § 1746 and ORCPIE, I understand that any statement made

21. here in that is not true and correct to the best of my knowledge and belief will
22. Subject me to the penalties of perjury. With that knowledge, I hereby affix my true and
23. Correct Signature.

DATED this 18th day of October, 2021

RESPECTFULLY SUBMITTED.

A. J. Manning

ANDREW JAMES MANNING # 1160216483

DECLARANT PRO- SE

OREGON STATE CORRECTIONAL INSTITUTION

3405 DEER PARK DRIVE. SE

SALEM, OREGON 97310